

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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NICOLE SPENCE,

Plaintiff,

— against —

INNER CITY BROADCAST CORPORATION, ICBC
BROADCAST HOLDINGS, INC., WENDY WILLIAMS-
HUNTER, also known as "WENDY WILLIAMS," in her
official and individual capacities, and KEVIN HUNTER,
in his official and individual capacities,

Defendants.
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ECF Case

08 CIV 5360 (WHP)(KNF)

JOINT PROPOSED DISCOVERY PLAN

Pursuant to Fed. R. Civ. P. 26(f), counsel for the parties hereby submit this Joint Proposed Discovery Plan. Counsel for all parties participated in the meeting required by Fed. R. Civ. P. 26(f) on July 23 and July 25, 2008, and subsequently prepared this proposed plan.

1. The deadline to join additional parties is November 14, 2008.
2. The deadline for amending the pleadings is November 14, 2008.
3. The deadline for making initial disclosures is August 29, 2008.
4. The deadline for serving initial document requests and initial interrogatories is September 8, 2008.

5. The deadline for providing responses and producing documents in response to document requests and interrogatories will be thirty days after service of the requests and interrogatories.

6. Depositions will commence on or after October 20, 2008.

7. The deadline for completing all party depositions is December 15, 2008.

8. The deadline for plaintiffs to furnish their expert report is December 15, 2008.

9. The deadline for defendants to furnish their expert report is January 15, 2009.

10. The deadline for completing discovery is February 17, 2009.

11. The deadline to file a pretrial order is March 19, 2009.

12. The deadline for requesting a pre-motion conference to file a summary judgment motion is March 2, 2009.

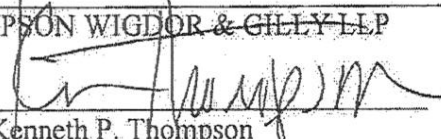
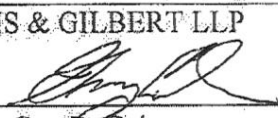
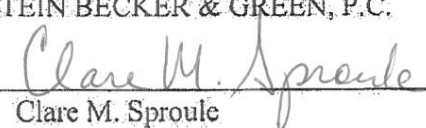
13. The estimated length of trial is 5-10 days.

14. The parties have agreed to explore settlement negotiations prior to the initial conference.

15. The parties agree that the inadvertent disclosure of information in discovery will not waive the attorney-client privilege, the attorney work-product doctrine or any other privilege.

16. Electronic documents will be Bates stamped and produced in a format to be further discussed by the parties prior to and/or at the conference on August 1, 2008.

17. The defendants will be moving at the appropriate time for a protective order pursuant to Fed. R. Civ. P. 26(c) with respect to the production of certain confidential information.

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<p>EPSTEIN BECKER & GREEN, P.C.</p> <p>By: </p> <p>Clare M. Sproule 250 Park Avenue New York, NY 10177 (212) 351-4500</p>	